

**Gabbard & Kamal PLLC**

Attorneys and Counselors at Law  
1270 Avenue of the Americas, Floor 16  
New York New York 10020  
T) 646-439-0750  
F) 646-381-9784

April 14, 2015

VIA ECF

Hon. Alison J. Nathan  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

*Re: Angell v. Billabout, LLC, et al., Case 1:15-cv-00079-AJN*

Dear Judge Nathan:

We represent Plaintiff Sloane Angell in the above-referenced matter. We write pursuant to Rule (1)(D) of your Honor's Individual Practices in Civil Cases to request that the April 17, 2015 Rule 16 Conference be adjourned to a later date. This request is made with the courteous consent of Lynne Crofton, counsel for Defendants Billabout, LLC, B Space Studio, LLC and Peter Maiden.

The reason for the request is that counsel for plaintiff and defendants are engaged in productive settlement discussions and would like additional time to attempt to settle before both sides incur additional costs, expenses and attorneys' fees.

This is the first request that the Rule 16 Conference be adjourned. Counsel has agreed to three mutually agreeable alternate conference dates which are May 8, 2015, May 15, 2015 and May 22, 2015.

Respectfully submitted,

/s/ \_\_\_\_\_  
Tom Chia-Kai Wang, Esq.  
Counsel for Plaintiff Sloane Angell

cc: Lynne Crofton (via email)